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By Office of the Commission Secretary at 9:25 am, Sep 30, 2022

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

September 30, 2022

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1081 - For A Better Colorado  
and Melinda Paterson, Treasurer (C00758664)

RESOLUTION TERMS: Certify closure of the Committee's federal account and  
terminate its political committee status; and pay a civil  
penalty of \$12,625.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1081 (RAD 22L-16). The ADR Office received this referral from the Reports Analysis Division (RAD) on June 14, 2022.

**SUMMARY:** RAD referred For A Better Colorado and Melinda Paterson (Respondents or the Committee) for four (4) issues.

Respondents failed to timely file one (1) 48-Hour Report totaling \$59,523.90 to support two (2) independent expenditures disclosed in the Amended 2020 October Quarterly Report, received October 26, 2021. The 48-Hour Reports were filed on January 5, 2021 and October 26, 2021, albeit untimely.

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Respondents failed to disclose all financial activity on their 2020 October Quarterly Report. On May 5, 2021, the Committee filed an Amended 2020 October Quarterly Report which disclosed \$59,523.90 in additional disbursements.

Respondents failed to disclose all financial activity on their 2020 12-Day Pre-General Report. On October 26, 2021, the Committee filed an Amended 2020 12-Day Pre-General Report which disclosed \$50,030.00 in additional disbursements.

Lastly, Respondents failed to timely file one (1) 24-Hour Report totaling \$50,000.00 to support two (2) independent expenditures disclosed in the Amended 2020 12-Day Pre-General Report, received October 26, 2021. The 24-Hour Report was filed on October 26, 2021, albeit untimely<sup>1</sup>.

During negotiations, the Committee acknowledged its failure to timely disclose the independent expenditures and stated that it was unaware of independent expenditure reporting requirements since this was its first independent expenditure campaign. The Committee additionally notes that it intends to terminate its political committee status upon resolution of this matter.

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<sup>1</sup> This is the same 48-Hour Report referenced above for Independent Expenditures disclosed in the 2020 October Quarterly Report. The Committee incorrectly included the Independent Expenditure on a 48-Hour Report instead of the required 24-Hour Report of Independent Expenditures.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of For A Better Colorado and Melinda Paterson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.